



October 18, 2004

Jim Christiansen
EPA Region VIII
999 18th St., Suite 300
Denver, CO 80202

RE: Libby Railyard Biotite Removal, Libby, Montana
EMR Project No. 5539.004
October 8, 2004 Weekly Progress Report

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EPA REGION VIII
SUPERFUND BRANCH

Dear Mr. Christiansen,

Per the Administrative Order on Consent for Removal, the following is the Weekly Progress Report submitted by EMR, Inc. (EMR) on behalf of the Burlington Northern and Santa Fe Railway Company (BNSF) for the Libby Railyard, Montana, Libby Asbestos Site, Libby Montana. In addition to this report, EMR will also be responsible for the required monthly report on this project through the close of this project.

CURRENT WEEK'S ACTIVITIES

Envirocon, Inc. (Envirocon) continued the removal of railroad ties; ties that had been washed were loaded into high sided gondola railroad cars and staged off site for disposal. Envirocon completed backfilling the scale excavation with clean fill material.

Envirocon continued with soil excavation on the west end of the site and shipped 55 truck-loads to the Lincoln County Landfill between Monday October 4, 2004 and Friday, October 8, 2004. During this week Envirocon was also hauling clean fill and sub-ballast into the site for backfilling and capping and placed geotextile cloth.

The truck decontamination pad at the east end was decommissioned; a new one will be built the week of October 11, 2004 at the west end of the Site. Soil clearance samples were collected beneath the east end decontamination pad.

Montana Railroad Services (MRS) completed removal of rail and other steel track material at the west end of the site. Rail and track material was removed from the site following decontamination.

Air samples are being collected daily. Personal samples are being analyzed by a combination of Phase Contrast Microscopy (Method 7400, Issue 2) and Transmission Electron Microscopy (TEM) AHERA method. Area samples are being analyzed by TEM AHERA Method. Preliminary laboratory results for TEM samples are being submitted to the USEPA and Volpe via facsimile upon receipt by EMR in Minneapolis, Minnesota. Final laboratory data will be submitted in hard copy form once received.

Results of air samples received during the week indicated 4 samples with detectable Libby Amphibole (LA). The laboratory detected two asbestos structures in BN-00379 and one asbestos structure in samples BN-00343, BN-00347, and BN-00370 resulting in airborne asbestos concentrations of 0.0076, 0.0045, 0.0021, and 0.0038 structures per cubic centimeter (S/cc), respectively. The detectable concentrations of asbestos or LA fibers did not exceed the clean air standard of 0.01 fibers per cubic centimeter, thus the workers did not exceed the protection of their respirators.

Clearance soil samples are being collected on Site; as of October 8, results for samples BR-23000 through BR-30000 and BN-71001 had been received. LA was detected in clearance samples BN-71001, BR-29000, and BR-30000 at a concentration of less than one percent (<1%) tremolite/actinolite. No LA was detected in the other clearance sample results received during this week.

During the previous week, LA was detected at a concentration of less than one percent (<1%) Tremolite/Actinolite in clearance samples BR-17000 and BR-18000; EMR requested that the discrete samples for these two composites be analyzed. Results of the discrete samples for BR-18000 (BR-18001 through BR-18004) did not indicate the presence of asbestos or LA above detection limits. The composite samples for BR-17000 consisted of samples BR-17001 through BR-17004; discrete sample BR-17002 was reported to contain <1% tremolite/actinolite; the remaining discrete samples (BR-17001, BR-17003, and BR-17004) did not contain asbestos or LA above the detection limit.

Following additional excavation at the location of sample BR-17002, sample BX-17002 was collected; no asbestos or LA was detected in the new clearance sample.

All soil samples are submitted for analysis by Polarized Light Microscopy (PLM) method 9002, Issue 2. Additional discrete samples were submitted but were not analyzed at this time. Preliminary data has been received by EMR and was submitted via facsimile to the USEPA. No final copies of soil analytical data collected last week have been received.

PROBLEMS ENCOUNTERED

No problems have been encountered to date.

ACTIVITIES PLANNED FOR NEXT TWO WEEKS

A new decontamination pad will be built at the west end of the Site.

Soil removal will continue at the west end. Backfilling and grading will continue in areas that have passed soil clearance without detections of LA. Clean fill and the geotextile cloth cap placement will commence. The tie washing equipment will be decontaminated and decommissioned.

If you have any questions or require further explanation concerning the above information, please call Tanya Drake of EMR at (763) 277-5200, Chuck Soule of

Kennedy/Jenks Consultants at (253) 874-0555, or David Smith of BNSF at (406) 447-2307.

Sincerely,
EMR, Inc.



Tanya Drake
Project Coordinator

cc: Mr. David Smith, BNSF Manager Environmental Remediation, Helena, Montana
Mr. Dave Diem, Kennedy/Jenks Consultants, Libby, Montana
Mr. Chuck Soule, Kennedy/Jenks Consultants, Federal Way, Washington
Ms. Courtney Zamora, Volpe Federal Programs, Libby, Montana
Mr. Dan McCaskill, BNSF Industrial Hygiene, Ft. Worth, Texas